

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

LOGAN PAUL,

*Plaintiff,*

v.

STEPHEN FINDEISEN AND COFFEE BREAK  
PRODUCTIONS LLC D/B/A COFFEEZILLA,

*Defendants.*

Civil Action No. 5:24-cv-00717

**DECLARATION OF LOGAN PAUL IN SUPPORT OF PLAINTIFF'S MOTION TO  
COMPEL PRODUCTION OF COMMUNICATIONS  
RELEVANT TO DEFENDANTS' ACTUAL MALICE**

I, Logan Paul, declare as follows:

1. I am the Plaintiff in this action. I submit this declaration in support of Plaintiff's Motion to Compel Production of Communications Relevant to Defendants' Actual Malice and the reply in support thereof. The following facts are within my personal knowledge and, if called and sworn as a witness, I would testify competently as to them.

2. I have been in the public eye for more than a decade, starting in college when I gained popularity as a content creator on a now-defunct short-form video hosting platform called Vine. From there I have branched into numerous other interests, including hosting a popular podcast called *Impulsive*, professional boxing, and wrestling with the WWE. I am also an entrepreneur and have been involved with launching several successful business ventures, including as co-founder of the beverage company Prime and the lunch kit Lunchly.

3. Around 2020, I became interested in the burgeoning fields of Non-Fungible Tokens ("NFTs"), cryptocurrencies, and the blockchain.

4. In early 2021, I had an idea for a blockchain-based game based on an animal fusion concept. My idea for what ultimately became “CryptoZoo” was a game that would take place in a virtual ecosystem where players could acquire egg NFTs that would then “hatch” into *base* animals, and those base animals could then be bred with others to create fanciful *hybrid* animals of different rarities (such as, for example, breeding penguin and lion base animals to create a “penguilion”).

5. Although I had an interest in the world of NFTs, cryptocurrency, and blockchain technology, my knowledge of these areas was, and is, extremely limited, and I knew I would need significant help from those with the technical expertise to bring my idea to life. I therefore worked with my management team to assemble a team of people that we understood to be experts in the digital asset market and blockchain game development.

6. Unfortunately, as is true of many business startups, CryptoZoo never came to fruition as I envisioned it. There were a variety of reasons for that, not the least of which was that some of the purported experts I had trusted and relied upon did not have the project’s best interests at heart and failed to perform their roles with competence. Although these individuals presented to me and my management team with seemingly impressive credentials and solid references, unbeknownst to me at the time, it turned out that they were in some instances misrepresenting their experience and capabilities.

7. The failure of CryptoZoo was emotionally crushing for me. I truly believed in the project and had devoted significant time, energy, and resources to trying to build it. I believed it could be the next Pokémon. Not only did I never profit from the project, I spent hundreds of thousands of dollars trying to make it a reality. I still believe in the concept to this day.

8. I felt that I had let down my supporters who had acquired CryptoZoo NFTs with the intention of playing the game, and who were as frustrated as I was that it had never come to fruition. So, in January 2024, I publicly announced a plan that I had been working on for months: A buyback program where I would commit my personal funds to buy CryptoZoo NFTs for their original purchase price—even though I had not personally received the funds that had been used to purchase the NFTs in the first place. I am not aware of any similar type of effort in the cryptocurrency/blockchain space; I believe this was a unique and novel concept. The buyback program was an enormous success, and I ultimately dispersed over \$1 million of my own money (in Ethereum) to buy back CryptoZoo NFTs from eligible claimants.

9. Defendant Stephen Findeisen is a YouTube personality who goes by the moniker “Coffeezilla,” and who claims to be an “internet detective” focused on rooting out and exposing financial frauds and scams. Although he portrays himself as a journalist, he has no formal education or training in journalism. Before becoming a YouTube personality, he worked as a salesperson for a home builder in the San Antonio area.

10. Beginning in December 2022, Mr. Findeisen produced and published a series of YouTube videos about the CryptoZoo project. His videos correctly noted and identified some of the issues and pitfalls that the project encountered, including incompetence and misrepresentations by some of the individuals I had trusted to build the game.

11. But Mr. Findeisen’s videos also repeatedly conveyed to his millions of viewers that CryptoZoo was a fraudulent and dishonest scheme perpetrated by me to make a profit. The accusation that I orchestrated CryptoZoo as a scam is not only false but directly contradicted by the available evidence, including communications Mr. Findeisen himself possessed and not only recklessly disregarded, but hid from his audience.

12. Mr. Findeisen's motivation for targeting me, a well-known celebrity, with these false accusations is self-evident. His videos attacking me gained a massive audience and in turn helped drive subscribers and revenue for his YouTube channel. For example, his December 16, 2022 video, titled "Logan Paul's Biggest Scam," has been viewed over ten million times.

13. Particularly galling to me is the fact that Mr. Findeisen continued to accuse me of perpetrating a scam despite his knowledge that I did not profit from the project in any way, that I instead lost large sums I invested in the project, and that I then committed my personal funds to buy back and make whole those who bought CryptoZoo NFTs hoping to participate in the game.

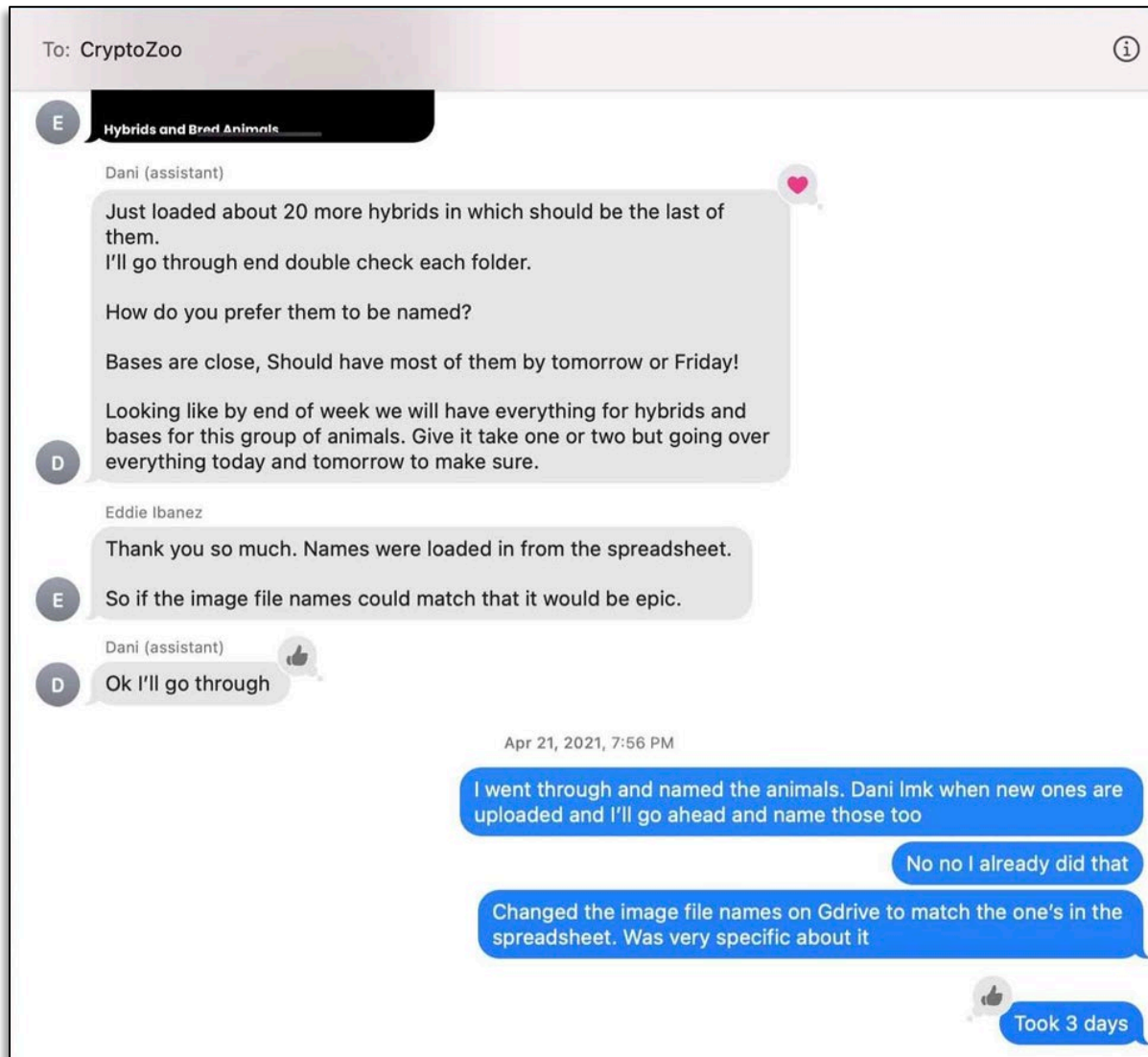
14. But Mr. Findeisen knew even more than that. It is apparent from his videos about CryptoZoo that Mr. Findeisen was in possession of various contemporaneous communications that I had with others involved in the project. For example, in a video that he published on December 23, 2022,<sup>1</sup> Mr. Findeisen aired screenshots of messages from a text thread involving myself and numerous other individuals who were working on the development of CryptoZoo. Thus, it is undisputed that as of that date—which precedes the defamatory statements at issue in this case in which Mr. Findeisen repeatedly claimed that CryptoZoo was a scam perpetrated by me—Mr. Findeisen was in possession of that text chain.

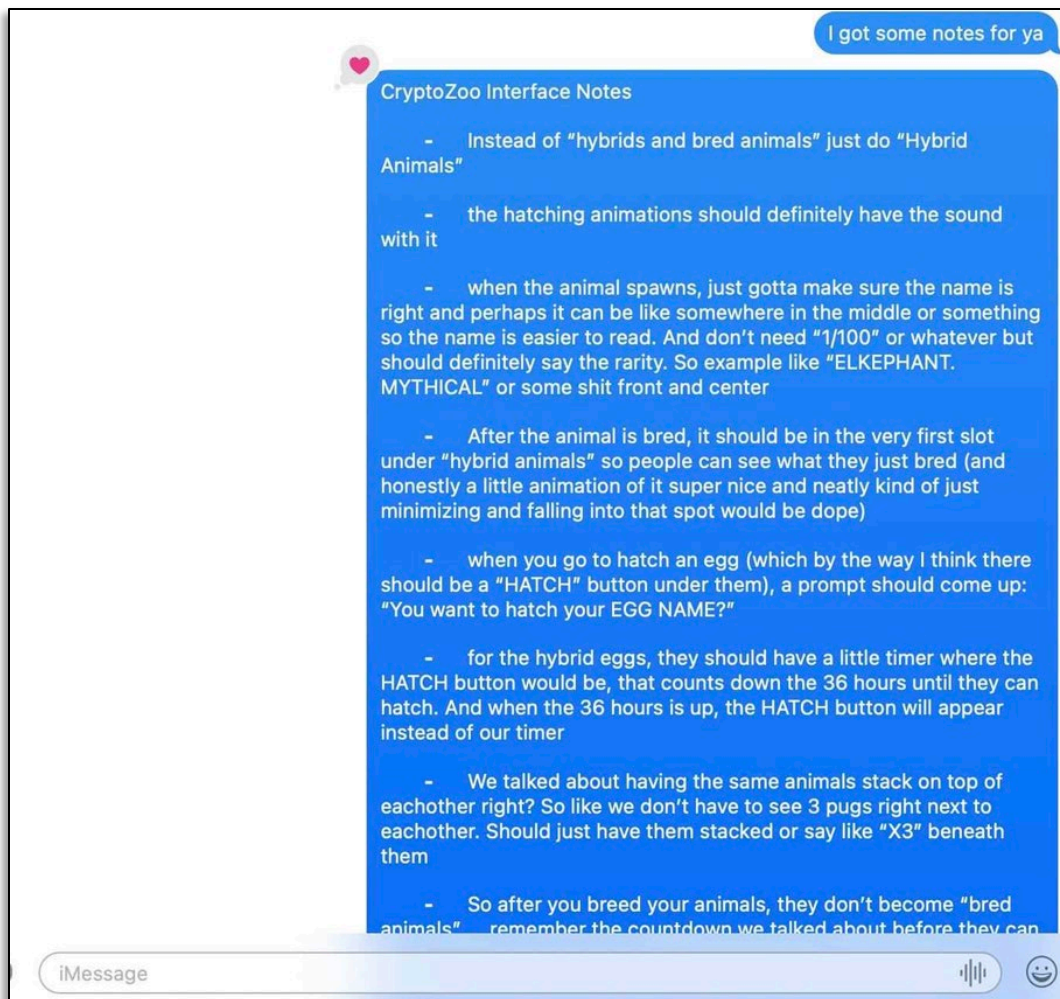
15. That text chain, which is attached hereto as **Exhibit A**, unequivocally demonstrates that my efforts with respect to CryptoZoo were taken entirely in good faith, that I never set out to scam anyone, and that I was trying my best to realize my dream of making a fun and novel blockchain game.

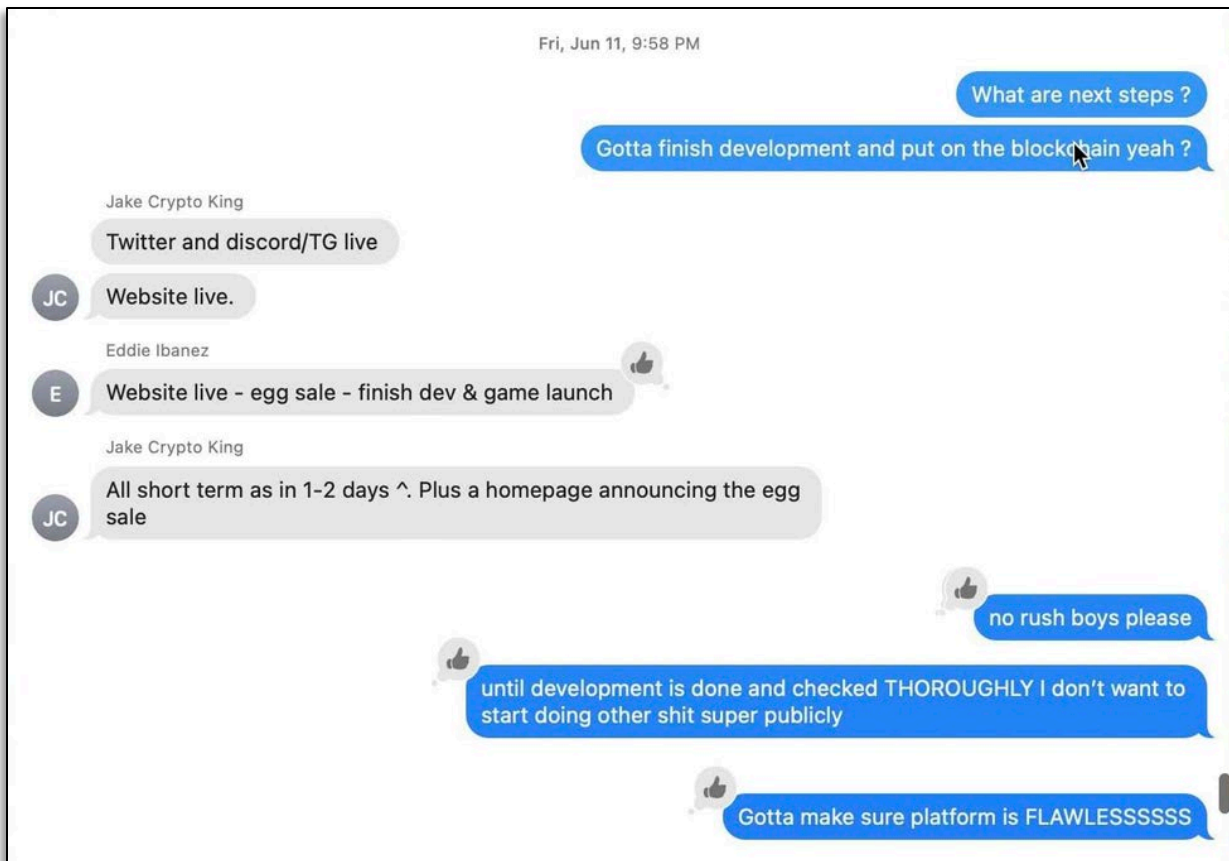
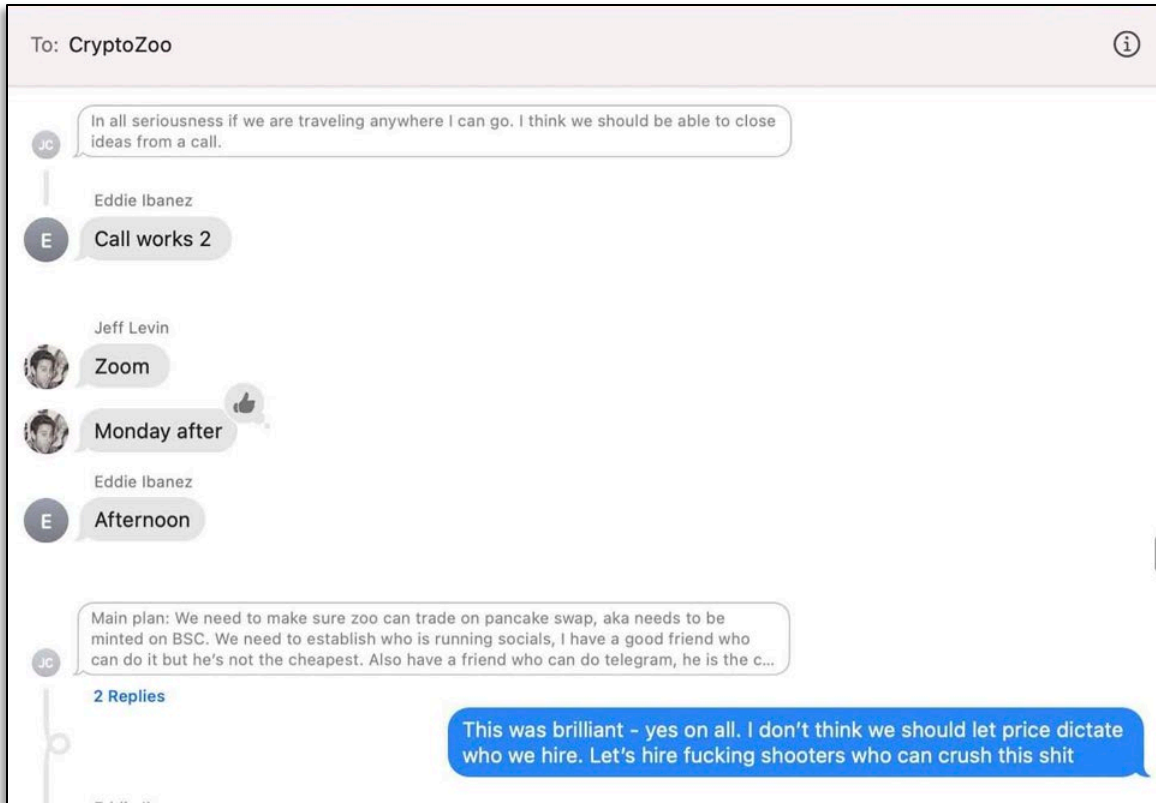
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<sup>1</sup> <https://www.youtube.com/watch?v=8-fugWMBwCg&list=PL4qw3AkxFDSNYGZAS84sPlQn20Ezcx8Ks&index=3>

16. Below is just a small sampling of messages that I sent to the group during efforts to develop the project (my texts are in blue as this version of the text thread comes from my phone):





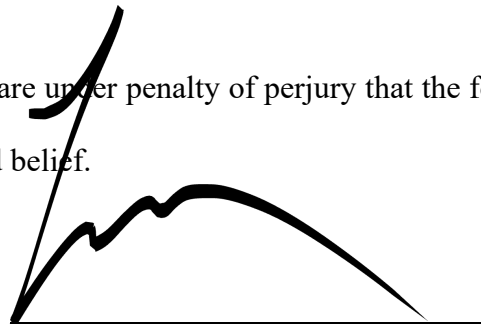


17. No reasonable reader, particularly one purporting to be a journalist, could review these communications reflecting my contemporaneous actions and intentions with respect to CryptoZoo and reach the factual conclusion that I was trying to scam anyone. And yet, not only did Mr. Findeisen repeatedly publish his false claim that CryptoZoo was “Logan Paul’s scam,” but he selectively published only misleading portions of the communications in his possession, while intentionally omitting others, in order to convey this false impression to his audience.

18. Although it is apparent from the December 23, 2022 video that Mr. Findeisen was in possession of some portion of this text thread, I do not know for sure what other contemporaneous communications reflecting my involvement with CryptoZoo Mr. Findeisen may have had at the time he published the defamatory statements at issue in this case. I believe—and Mr. Findeisen has not denied—that he had others. As with the text chain referenced above, I am certain all such communications would reflect my good faith and honest intentions with respect to the CryptoZoo project.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on February 8, 2025



Logan Paul